



LEGAL AID SOCIETY OF DAYTON, INC.

333 WEST FIRST STREET • SUITE 500 • DAYTON, OHIO 45402-3031 • PHONE (937) 228-8088
TDD (937) 449-8125 • FAX (937) 449-8131

GARY J. WESTON
Executive Director

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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December 18, 1996

Case No. CC Docket No. 96-45

Please file the enclosed documents in the above captioned case and return the extra copies to my office in the enclosed self-addressed envelope.

Thank you very much,

Ellis Jacobs

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DEC 20 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
Federal-State Joint) CC DOCKET NO. 96-45
Board on Universal)
Service)

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the right to comment on these sections as later opportunities may allow or as an endorsement of those sections.

SUPPORT FOR LOW - INCOME CONSUMERS

Edgemont applauds the Board's Recommendations that carriers receiving universal source support be prohibited from disconnection local lifeline service for non-payment of toll charges, paragraph 387, that service connection charges be reduced, paragraph 427, and that deposits be eliminated in certain conditions, paragraph 429.

Penetration rates, however, will be furthest advanced if service connection charges and deposits are completely eliminated, with no conditions, by the Lifeline/Link-up program. In the alternative, states should be given an incentive to eliminate the remaining charges and deposits.

Further, our experience with the Lifeline program established in the Ameritech-Ohio service territory, the Universal Service Assistance Program (USA), indicates that the low income recommendations will need some elaboration and clarification in order to capture their promise.¹

Many of the people who will be eligible for Lifeline/Link-up will have had their phone service disconnected at some point in

¹The Universal Assistance Program (USA) was established in the Ameritech Advantage Ohio Order, Exhibit G, PUCO Case No. 93-487-TP-ALT. Counsel for Edgemont presently chairs the USA Advisory Committee established by that Order. The Committee provides advice on and evaluates the performance of the USA program.

the past for failure to pay bills. It will not be unusual for their arrearages to be between 500 and 1,000 dollars, most of it attributable to long distance service. These people will not be able to take advantage of the Lifeline/Link-up programs if companies are allowed to make unrealistic arrearage repayment demands, before reconnecting service.

The rules should explicitly state that:

(1) Companies offering local service may only look to repayment of their own local arrearage for customers seeking to reestablish local service. This is a correlary of the unbundling of local and long distance disconnection.

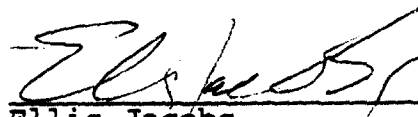
(2) Companies must make reasonable repayment arrangements for both local and toll arrearages. For instance, in the USA program applicants are asked for \$50 or 10% of the arrearage, whichever is less, as a down payment with the remainder to be paid over 18 months.

Without a clear policy on arrearage repayment a great many people who should benefit from these programs will not be able to. They will continue to be blocked by large up front charges. The Joint Board has already recognized that such charges are barriers which need to be overcome in order to increase penetration.

These modifications will not only allow low income customers to reconnect to the system but it will allow companies to collect

on arrearages which they would otherwise never have collected upon.

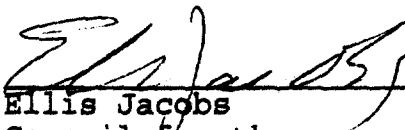
Respectfully submitted,



Ellis Jacobs
Council for the
Edgemont Neighborhood
Coalition
LEGAL AID SOCIETY OF DAYTON
333 West First Street, Suite 500
Dayton, OH 45402
(513) 228-8088, Extension 111

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Comments of the Edgemont Neighborhood Coalition has been served upon each of the parties listed on the attached pages by regular U.S. Mail, postage prepaid, on December 17, 1996.



Ellis Jacobs
Council for the
Edgemont Neighborhood Coalition

The Honorable Reed E. Hundt, Chairman
Federal Communication Commission
1919 M Street, N.W. --Room 814
Washington, D.C. 20554

The Honorable Andrew C. Barrett, Commissioner
Federal Communication Commission
1919 M. Street, N.W.--Room 832
Washington, D.C. 20554

The Honorable Susan Ness, Commissioner
Federal Communication Commission
1919 M Street, N.W.--Room 832
Washington, D.C. 20554

The Honorable Julia Johnson, Commissioner
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable Kenneth McClure, Vice Chairman
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65102

The Honorable Sharon L. Nelson, Chairman
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

The Honorable Laska Schoenfelder, Commissioner
South Dakota Public Utilities Commission
500 E. Capital Avenue
Pierre, SD 57501

Martha S. Hogerty
Public Counsel for the State of Missouri
P. O. Box 7800
Harry S. Truman Building, Room 250
Jefferson City MO 65102

Deborah Dupont, Federal Staff Chair
Federal Communication Commission
2000 L Street, N.W. Suite 257
Washington, D.C. 20036

Paul E. Pederson, State Staff Chair
Missouri Public Service Commission
P. O. Box 360
Truman State Office Building
Jefferson City, MO 65102

Eileen Benner
Idaho Public Utilities Commission
State Capital, 500 E. Capital Avenue
Pierre, SD 57501-5070

William Howden
Federal Communication Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20036

Lorraine Kenyon
Alaska Public Utilities Commission
1016 West Sixty Avenue, Suite 400
Anchorage, AK 99501

Debra M. Kriete
Pennsylvania Public Utilities Commission
P. O. Box 3265
Harrisburg, PA 17105-3265

Clara Kuehn
Federal Communication Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

Samuel Loudenslager
Arkansas Public Service Commission
P. O. Box 400
Little Rock, AR 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, Pennsylvania 17120

Michael A. McRae
D.D. Office of the People's Counsel
1133 15th Street, N.W., Suite 812
Washington, D.C. 20036

Terry Monroe
New York Public Service Commission
Three Empire Plaza
Albany, NY 12223

Andrew Mulitz
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, D. C. 20036

Mark Nadel
Federal Communication Commission
1919 M Street, N.W., Room 542
Washington, D.C. 20554

Gary Oddi
Federal Communication Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

Teresa Pitts
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, WAS 98504-7250

Jeanine Poltronieri
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

James Bradford Ramsay
National Association of Regulatory Utility Commissioners
1201 Constitution Avenue, N.W.
Washington, D.C. 20423

Jonathan Reel
Federal Communications Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Gary Seigel
Federal Communication Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20036

Pamela Szymczak
Federal Communication Commission
2000 L Street, N.W., Suite 257
Washington, D.C. 20036

Whiting Thayer
Federal Communication Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20036

M. Barry Payne
Indiana Office of Utility Consumer Counselor
100 N. Senate Ave. Room N501
Indianapolis, IN 46204-2215

Alex Belinfante
Federal Communication Commission
1919 M. Street, N.W.
Washington, D.C. 20554

Larry Provich
Federal Communication Commission
1919 M Street, N.W.
Washington, D.C. 20554